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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania ☐

\_\_\_\_ Pittsburgh \_\_\_\_ Division

John Edward Foland  
Gabriela Lucia Küster  
Anthony Rimer

Case No.

2:22-cv-153

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Facebook Corp.  
and The Commonwealth of Pennsylvania

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	John Edward Foland
Street Address	201 Fifth Street #5
City and County	Ellwood City Lawrence County
State and Zip Code	Pennsylvania 16117
Telephone Number	7244175640
E-mail Address	johnfolandsameone@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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## Defendant No. 1

Name	Mark Zuckerberg Facebook Corporation
Job or Title <i>(if known)</i>	
Street Address	1 Hacker Way, Menlo Park, California, United States
City and County	Menlo Park
State and Zip Code	California 94025
Telephone Number	
E-mail Address <i>(if known)</i>	info@facebookmail.com

## Defendant No. 2

Name	The Commonwealth Of Pennsylvania
Job or Title <i>(if known)</i>	
Street Address	508 Main Capitol Building, Harrisburg, PA 17120
City and County	Harrisburg, PA, Dauphin County
State and Zip Code	PA 17120
Telephone Number	
E-mail Address <i>(if known)</i>	Unknown

## Defendant No. 3

Name	The Pennsylvania State Police
Job or Title <i>(if known)</i>	
Street Address	1800 Elmerton Ave
City and County	Harrisburg, Dauphin County
State and Zip Code	PA 17110
Telephone Number	
E-mail Address <i>(if known)</i>	unknown

## Defendant No. 4

Name	William Pitorous
Job or Title <i>(if known)</i>	911 dispatcher
Street Address	351 14th Street, Ambridge (PA), 15003
City and County	Ambridge (PA), 15003
State and Zip Code	Ambridge (PA), 15003
Telephone Number	+1 724-775-0880
E-mail Address <i>(if known)</i>	unknown

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Section 7

Other offences committed abroad

German Criminal Code

(1) German criminal law applies to offences committed abroad against a German national if the act is a criminal offence at the place of its commission or if that place is not subject to any criminal law jurisdiction.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* John Edward Foland, Gabriela Lúcia Küster, is a citizen of the State of *(name)* The United States, Frau Küster (German Citi .

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* William Pitorous, is a citizen of the State of *(name)* Pennsylvania . Or is a citizen of *(foreign nation)* United States .

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## b. If the defendant is a corporation

The defendant, (name) Facebook Corporation, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.  
 Or is incorporated under the laws of (foreign nation) Deutschland, and has its principal place of business in (name) Deutschland.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I Intend to Sue Facebook, Mark Zuckerberg Has Allowed Colin Powell and A Group Of Local Policemen Whom I have accused Of Murder to Commit Bank Fraud and Attempt to Blame it on Me  
 This Profile is Not My Wife Gabriela Foland (Gaby Foland)  
<https://m.facebook.com/profile.php?id=1243946891>  
 and They have Also Allowed a Woman from London To Pretend to Be Bank Of America,  
 1.11.2018 Bank-of America | Facebook,Fake Bank Of America facebook,Linked to BofA Site  
<https://www.facebook.com/bankof.america.7967>

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking for 1.8 Million Dollars,  
 it Is My belief That The Pennsylvania Police have organized a facebook friending Campaign asking Women to Befriend me or Others of Friends of mine,asking for Bank Accounts to be opened or Asking for Gift cards to be sent in the Hopes of portraying a High Criminality in the Purchase of Gift cards for others,or to Acquire Bank account Information,The State Of Pennsylvania had passed a law That The State Police Could impersonate your friends On facebook,and Ask you to come over and get High or Get them Dope.to Garner Information To Defend a Monaca Police officer and A another Man I had turned in for murder,

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The Former Officer had over portrayed the Idea of Trading Gift Cards for Crack Cocaine, He had helped the Man who I had Claimed To have Killed a Woman From Ohio, and Three Boys In Butler County to Make Withdrawals I believe that the Girls were lined Long before I started to Friend them Over facebook by the hundred, My belief is That facebook allowed me to Reopen a Facebook Account in February 2021 because they had already arranged for the Woman to befriend me Right after I Befriended a Known friend ED SKERLAC,

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/12/2022

Signature of Plaintiff

Printed Name of Plaintiff

John Edward Foland

### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address